IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Alexandria Division)

In re:

WW Contractors Inc., * Case No: 18-12095-BFK

Debtor. * Chapter 11

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LIMITED OBJECTION TO DEBTOR'S MOTION TO DISMISS CASE

Meridian Law, LLC, former counsel to debtor and debtor-in-possession in the above-captioned case (the "Debtor"), hereby files this *Limited Objection to Debtor's Motion to Dismiss*Case (the "Motion"), and in support thereof states as follows:

THE CHAPTER 11 CASE

- 1. On June 12, 2018, the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Code in the United States Bankruptcy Court for the District of Maryland, Case No. 18-17927. On June 14, 2018, the Bankruptcy Case was transferred to the United States Bankruptcy Court for the Eastern District of Virginia and was assigned Case No. 18-12095 (the "Bankruptcy Case").
- 2. Pursuant to an order entered on August 15, 2018, Meridian was approved as counsel to the Debtor, effective as of the Petition Date.
- 3. On or about November 1, 2018, the Debtor notified Meridian that the Debtor was replacing Meridian with Whiteford, Taylor & Preston, LLP as bankruptcy counsel.

4. On November 16, 2018, the Debtor filed the Motion, wherein the Debtor is seeking dismissal of the Bankruptcy Case.

LIMITED OBJECITON

5. Meridian does not object to the dismissal of the Bankruptcy Case. It does, however, object to the dismissal of the case without the entry of an order containing provisions regarding fees and expenses incurred by professionals retained in this Bankruptcy Case. (In addition to Meridian, the accounting firm of Rosen, Sapperstein & Friedlander, LLC was approved on August 15, 2018 as accountant to the Debtor, effective as of the Petition Date.) Meridian further objects to the dismissal of the Bankruptcy Case to the extent that the contemplated dismissal of the case is not conditioned on payment of duly approved fees and expenses of the Debtor's professionals.

CONCLUSION

WHEREFORE, Meridian Law, LLC respectfully requests that this Honorable Court (a) condition the dismissal of the instant Bankruptcy Case on the entry of an order (i) setting forth provisions regarding fees and expenses incurred by professionals retained in this case; and (ii) directing the payment of duly approved fees and expenses of the Debtor's professionals; and (b) grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Aryeh E. Stein

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December, 2018, a copy of the foregoing *Limited Objection to Debtor's Motion to Dismiss Case* were served electronically to the following parties on the Court's CM/ECF notice list:

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/s/ Aryeh E. Stein
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